

Payam: As a courtesy, I briefly went through the proposed changes and have a few initial comments and suggestions - hope they help.

1. All the other California code references should be 2007  
[http://www.bsc.ca.gov/apprvd\\_chngs.html](http://www.bsc.ca.gov/apprvd_chngs.html)
2. Strongly recommend changing **high**-sloped to **steep**-sloped - no one in the roof industry calls it high slope and it gets confusing to some when talking about high-rise -(there is 1 high slope reference in the CBC Chapter 15)
3. I found a few instances throughout of commission = Commission
4. Found a few instances of "building department" I think it should be enforcement agency or jurisdiction??
5. 101 Building Envelope wording seems odd - "ensemble" assembly of the exterior components? claddings??
6. 101 Cool Roof is a "roofing material" - roof covering or surfacing ? with specific minimum thermal emittance ... specific minimum solar reflectance ???
7. 101 Fireplace "as further clarified in the CBC and CMC
8. **101 ROOF**

**ROOF** is the outside cover of a building or structure including the structural supports, decking, and top layer that is

exposed to the outside with a slope less than 60 degrees from the horizontal.

Consider for terminology clarity **ROOF** is at the upper-most part of a building or structure including the structural supports, deck and exterior cladding envelope that is exposed to the exterior with a slope less than 60 degrees from horizontal plane.

9. 101 Consider add - as I recall reading the proposed info., there is criteria for some structures above the roof that might not require all aspects of T24P6 such as mechanical PHouses or elevator enclosures as noted in 143, page 16 (c) Exception you've added **permanent structure above the roof**. The following comes right out of the New CBC Chapter 15 Definitions (based on 2006 IBC with T24P2 changes)

**ROOFTOP STRUCTURE.** An enclosed structure on or above the roof of any part of a building.

**PENTHOUSE.** An enclosed, unoccupied structure above the roof of a building, other than a tank, tower, spire, dome cupola or bulkhead, occupying not more than one-third of the roof area.

10. **101 Consider add - the document defines low-sloped roof but not steep-sloped** **STEEP-SLOPED ROOF** is a roof that has a ratio of rise to run of greater than 2:12 slope up to but less than 60 degrees from horizontal plane. (less than 60 degrees based on your roof def. - just to let you know the building code uses 24:12 in the Chapter 15 roof section for roofs but Chapter 14 Exterior Walls definitions uses 60 degrees or greater from horizontal plane)
11. 118 (c) It includes a CBC reference for meeting CBC req. for flamespread - as discussed in the past at length, why can't it include a similar ref. Consider add **Roof Covering Fire Rating. All roof covering material shall be installed in compliance with the requirements of the CBC for fire resistivity.**
12. 118 (f) Demising Walls ... Was deleted in 101 - no longer defined anywhere
13. 118 (i) 1. Exception -- why are the items that are there are singled out?? why aren't there more items recommend add **0.10 black roof coverings; 0.10 solar PV's on roof surface etc.**
14. 118 (i) 4. Recommend rewording for clarity of terminology and note with proposed steep-sloped cool roofs it's no longer limited to low-sloped

4. Liquid applied roof coatings applied to low-sloped roofs in the field as the top surface of a roof covering shall: Consider change: 4. Liquid roof coatings applied to roof coverings at the installation site as the top surfacing or as an integral part of a roof covering shall:
15. 118 (i) 4. A Recommend slight wording add for clarification because there could be some split roofs warehouse part/conditioned part etc.
- A Be applied where required for Part 6 compliance, across the entire roof surface to meet the dry mil thickness or coverage recommended by the coating
- manufacturer, taking into consideration the substrate on which the coating is applied, and
16. 143 (a) 3. Demising Walls ... Was deleted in 101 - no longer defined anywhere
17. 143, page 16 (c) Exception you've added permanent structure above the roof. - SEE my No. 9, poss change to **ROOFTOP STRUCTURE**
18. 149 page 2 B. Exception Roof recoverings where and when allowed by the CBC

Enough for now - I'm tired and this is the bulk of it. Hope it helps!!

See you Wednesday.

Sincerely,

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